

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

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|--------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA | : | INDICTMENT |
| | : | |
| v. | : | CRIMINAL NO. 5:14-CR-80 - MTT |
| | : | |
| KAMEICY LASHIA WALLER | : | VIOLATIONS: |
| | : | 20 U.S.C. § 1097 |
| Defendant. | : | 18 U.S.C. § 1341 |
| | : | 18 U.S.C. § 2 |

THE GRAND JURY CHARGES:

COUNTS ONE AND TWO
(Fraud Involving Federal Student Aid)

1.

From in or about October 2010, the exact date being unknown to the Grand Jury, until in or about November 2011, the exact date being unknown to the Grand Jury, in the Middle District of Georgia and elsewhere, Defendant KAMEICY LASHIA WALLER devised a scheme and artifice to defraud the United States Department of Education ("ED"), specifically its student aid programs, of money by means of false and fraudulent promises, representations and pretenses.

2.

The ED was a department and agency of the United States government that was responsible for administering Title IV Federal Student Assistance Programs throughout the United States, including the pertinent federal statutes and regulations relating to student financial assistance.

3.

The educational programs administered by the ED included various plans that provided financial assistance to eligible students pursuing post-secondary education at participating schools.

4.

The ED paid these program funds directly to the participating schools, which credited the funds to the student's accounts.

5.

Among other requirements, an applicant for federal student financial aid programs was required to: (A) be enrolled at least halftime in a qualifying program at an approved institution, (B) possess a high school diploma or its equivalent (such as a GED certificate).

6.

In addition, the applicant was required to submit to the ED a Free Application for Federal Student Aid ("FAFSA"). The FAFSA required the applicant to provide information including but not limited to, the student's name, date of birth, Social Security Number ("SSN"), and income. The applicant was required to complete, sign, and date the FAFSA, attesting to its accuracy and truthfulness.

7.

During the pertinent time period, the applicant submitted the FAFSA online through the internet. One of the questions on the FAFSA was whether the applicant possessed a high school diploma or GED. As a requirement for student aid under ED's regulations, it was a material fact to the ED whether the applicant possessed a GED or high school diploma.

8.

For eligible students, the ED would make an award for the student, which might include both grants and loans; the ED would transmit part of the aid award directly to the participating school to cover costs such as tuition and fees.

9.

If there were extra funds from the student's aid award, the school would disburse funds to the student for other educational costs; these payments were commonly known as "overages," and were paid by wire transfers from the school to the student's bank account or by checks written by the school and mailed to the student.

10.

Rio Salado College ("RSC") was a two-year college in Tempe, Arizona, and was authorized by the ED to administer federal financial aid programs to the school's students. RSC required its students seeking financial aid to submit, in addition to a FAFSA, additional information including, but not limited to, the student's name, date of birth, SSN, whether they had graduated from high school or had a GED, and financial data.

11.

University of Phoenix ("UOP") was a two-year college in Tempe, Arizona, and was authorized by the ED to administer federal financial aid programs to the school's students. UOP required its students seeking financial aid to submit, in addition to a FAFSA, additional information including, but not limited to, the student's name, date of birth, SSN, whether they had graduated from high school or had a GED, and financial data.

12.

It was a further part of the scheme to defraud that KAMEICY LASHIA WALLER, acting directly and indirectly through others, recruited individuals to enroll at RSC and UOP and to obtain student aid from the ED by making false statements that they possessed a GED or a high school diploma, and thus were qualified for ED financial aid, when, in truth and in fact, and as KAMEICY LASHIA WALLER knew, they did not possess a GED or high school diploma and were not eligible for financial aid from the ED.

13.

It was a further part of the scheme to defraud that KAMEICY LASHIA WALLER would charge the foregoing students at least \$650.00 for registering them in college and obtaining their federal financial aid for each school term, with the funds to be paid to KAMEICY LASHIA WALLER, when the overage monies were disbursed to the students by the schools.

14.

It was a further part of the scheme to defraud and obtain money from the ED by means of false and fraudulent pretenses and representations and promises, that is, by KAMEICY LASHIA WALLER with L. S, and A. B., submitting through the internet false statements contained in FAFSA forms, each such submission constituting a separate count of this indictment, to wit:

COUNT ONE

On March 21, 2011, KAMEICY LASHIA WALLER submitted an online FAFSA on behalf of A. B. that contained false information making A. B. eligible to receive Title IV funding to wit: that A. B. had a high school diploma.

All in violation of Title 20, United States Code, Section 1097.

COUNT TWO

On October 24, 2010, KAMEICY LASHIA WALLER submitted an online FAFSA on behalf of L. S. that contained false information making L. S. eligible to receive Title IV funding to wit: that L. S. had a high school diploma.

All in violation of Title 20, United States Code, Section 1097.

COUNTS THREE AND FOUR
(Mail Fraud)

The allegations contained in paragraphs 1 through 14 above are incorporated by reference as if set forth fully herein.

It was a further part of the scheme to defraud that KAMEICY LASHIA WALLER would cause RSC and UOP to have RSC and UOP send the overage monies to A. B. and L. S. by United States Postal Service to the their home address.

From on or about June 13, 2011, to on or about November 8, 2011, in the Middle District of Georgia, defendant KAMEICY LASHIA WALLER having knowingly devised and intending to devise, and while participating in, a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, for the purposes of executing the scheme and artifice, and attempting to do so, and while aided and abetted by A. B. and L. S., caused the items described below to be delivered by U.S. Postal Service, each such delivery constituting a separate count of this indictment, to wit:

COUNT THREE

On or about June 13, 2011, Citibank for RSC mailed a \$4,811.00 financial aid "overage" debit card ending 1997 to A. B. to 343 North Madison Avenue, Monroe, Georgia.

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT FOUR

On or about November 8, 2011, UOP mailed a \$1727.00 financial aid "overage" check number 763199 to L. S. to 716 Glenview Loop, Monticello, Georgia.


All in violation of Title 18, United States Code, Sections 1341 and 2.

A TRUE BILL.

s/FOREPERSON OF THE GRAND JURY

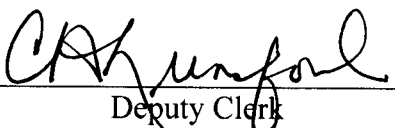
PRESENTED BY:

MICHAEL J. MOORE
UNITED STATES ATTORNEY



SONJA B. PROFIT
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 9th 10th day of December, 2014.



Deputy Clerk